1 The Hon

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CALEB CRAIG JACKSON.

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Plaintiff,

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CITY OF SEATTLE; SEATTLE POLICE DEPARTMENT; OFFICER S. MARTINELL; OFFICER HUGHEY; OFFICER S. SMITH; OFFICER S. KAFFER; OFFICER D. CONINE; and JOHN DOES 1-10,

Defendants.

NO. C08-1085RAJ

STIPULATION AND ORDER OF DISMISSAL OF ALL CLAIMS AGAINST ALL DEFENDANTS WITH PREJUDICE

Note on Motion Calendar: May 7, 2007

STIPULATION

Plaintiff Caleb Craig Jackson agrees to dismiss with prejudice all actual or potential claims that have been or may have been asserted against defendants City of Seattle, Seattle Police Department, Seattle Police Department Officer S. Martinell, Officer Hughey, Officer S. Smith, Officer S. Kaffer, Officer D. Conine and John Does 1-10 and/or any other city employee arising out of the events described in his complaint. No claims remain for trial and this matter may be dismissed in its entirety. By stipulated motion, the undersigned parties hereby move the court for entry of the order incorporated herein.

STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE - 1

C08-1085RAJ 3019-029672 345136 Stafford Frey Cooper

PROFESSIONAL CORPORATION
601 Union Street, Suite 3100
Seattle WA 98101.1374
TEL 206.623.9900 FAX 206.624.6885

1	Dated: May 7, 2009.	Dated: May 7, 2009
2	LEEMON & ROYER	STAFFORD FREY COOPER
3		
4	By: /s/ Mark Leemon, via ECF	By /s/ Karen L. Cobb, via ECF
5	Mark Leemon, WSBA #5005 Attorneys for Plaintiffs	Ted Buck, WSBA No. 22029 Karen L. Cobb, WSBA #34958 Attorneys for Defendants
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8	ORI	DER
9	Based upon the foregoing stipula	tion of the parties as evidenced by the
10	signatures of their attorneys, it is now, ORDERED, that all claims actually asserted or	
11	that could potentially have been asserted against the City of Seattle, Seattle Police	
	Department, Seattle Police Department Off	ficer S. Martinell, Officer Hughey, Officer S.
12	Smith, Officer S. Kaffer, Officer D. Conine	and John Does 1-10 and/or any other city
13	employee arising out of the events descri	bed in his complaint are DISMISSED with
14	prejudice and without costs to any party.	
15	DATED THIS day of March, 200	09.
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18		The Honorable Richard A. Jones
19	Presented by:	
20	rafford frey cooper rofessional Corporation	
21	By <u>/s/ Karen L. Cobb, via ECF</u>	
22	Ted Buck, WSBA #22029 Karen L. Cobb, WSBA #34958 Attorneys for Defendants	
23		
	STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE - 2	STAFFORD FREY COOPER PROFESSIONAL CORPORATION

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C08-1085RAJ

3019-029672 345136

1 Certificate of Service 2 I certify that on the date noted below I electronically filed this document entitled [Proposed] STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE with the 3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons: 4 5 Mark Leemon Leemon Royer PLLC 2505 Second Avenue, Suite 610 6 Seattle, WA 98121 (206) 269-1100 7 FAX: (206) 269-7424 Attorneys for Plaintiff Caleb Craig Jackson 8 9 DATED this 7th day of May, 2009, at Seattle, Washington. 10 11 /s/ Karen L. Cobb via ECF 12 13 14 15 16 17 18 19 20 21 22 23

STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE - 3

C08-1085RAJ 3019-029672 345136

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